

#### REDACTED – FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200 Greenbelt, Maryland 20770 phone: 301-459-7590, fax: 301-577-5575 internet: www.jsitel.com, e-mail: jsi@jsitel.com

October 11, 2013

ACCEPTED/FILED

OCT 1.8 2013

By Hand Delivery

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Federal Communications Commission Office of the Secretary

Re:

WC Docket No. 10-90, WC Docket No. 11-42

2013 ETC Annual Report of Highland Telephone Cooperative, Inc. - TN

Study Area Code 290565

Dear Ms. Dortch:

On behalf of Highland Telephone Cooperative, Inc. "Highland", JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules. Highland seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is also being filed this date via the FCC's Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall JSI Vice President

301-459-7590

ikuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

No. of Copie<mark>s rec'd\_</mark> List 7430**0**8

<sup>&</sup>lt;sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>&</sup>lt;sup>2</sup> Connect America Fund et al., WC Docket No. 10-90 et al., Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

	m 481 - Carrier Annual Reporting election Form		FEC Form 481 OMB Control No. 3060-09 July 2013	86/QMB Control No. 3060-0819
<010>	Study Area Code	290565		
<015>	Study Area Name	HIGHLAND TEL COOP-TN	ACC	EPTED/FILED
<020>	Program Year	2014	Ω	OT 1'U ana
<030>	Contact Name: Person USAC should contact with questions about this data	Dave Crawford	Federal Com	G
<035>	Contact Telephone Number: Number of the person identified in data line <030	423-628-2161	Offic	imunications Commission e of the Secretary
<039>	Contact Email Address: Email of the person identified in data line <030>	dave@highlandtel.net		
ANNUA	IL REPORTING FOR ALL CARRIERS			54.313 54.422 Completion Completion Required Required
<100>	Service Quality Improvement Reporting	(complete attach	ed worksheet)	(check box when complete)
<200> <210>	Outage Reporting (voice)	no outages to report	ed worksheet)	1
<310>	Unfulfilled Service Requests (voice)  Detail on Attempts (voice)  Unfulfilled Service Requests (broadband)  Detail on Attempts (broadband)	(attach descripti		
<400><410><420><420><440><450><	Number of Complaints per 1,000 customers (voice Fixed Mobile  Number of Complaints per 1,000 customers (broa Fixed Mobile			
<510> <600> <610> <700> <710> <800> <100> <1010> <1110> <1110>	Service Quality Standards & Consumer Protection  290565tn510  Functionality in Emergency Situations 290565tn610  Company Price Offerings (voice) Company Price Offerings (broadband) Operating Companies and Affiliates Tribal Land Offerings (Y/N)?  Voice Services Rate Comparability  Terrestrial Backhaul (Y/N)?  Terms and Condition for Lifeline Customers	Rules Compliance  (check to indicate (attached descripti (check to indicate (attached descripti (complete attache (complete attache (complete attache (ff yes, complete attache (check to indicate (attach descripti (if not, check to indicate (complete attache (complete attache (complete attache)	ive document) e certification) ive document) ed worksheet) ed worksheet) ed worksheet) ed worksheet) e certification) ive document) ed worksheet)	
<2000> <2005>	Price Cap Carriers, Proceed to Price Cap Additional Including Rate-of-Return Carriers affiliated with Price Cap Return Carriers affiliated with Price Cap Re			
<3000> <3005>	Rate of Return Carriers, Proceed to <u>ROR Addition</u>	al Documentation Worksheet (check to indicate (complete attache	· · · · · ·	

CONTRACTOR OF THE	rvice Quality Improvement Reporting illection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code 290565	
<015>	Study Area Name HIGHLANI	ND TEL COOP-TN
<020>	Program Year 2014	
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	423-628-2161
<039>	Contact Email Address - Email Address of person identified in data line <030>	> dave@highlandtel.net
<110>	Has your company received its ETC certification from the FCC?	(yes / no ) <b>O</b>
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no ) O O
	If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.	f.
<112>	Attach Five-Year Service Quality improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your CETC which only receives frozen support, your progress report is only required to address voice telephony service.	r company is a
	The state of the s	
	Please check these boxes below to confirm that the attached PDF, on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	
<113>	Maps detailing progress towards meeting plan targets	
<114>	Report how much universal service (USF) support was received	
<115>	How (USF) was used to improve service quality	
<116>	How (USF)was used to improve service coverage	
<117>	How (USF) was used to improve service capacity	
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	

<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data line	<030> 423-628-2161
<039>	Contact Email Address - Email Address of person identified in data line	<030> dave@highlandtel.net

<220>

<a>&gt;</a>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	<d></d>	<e></e>	<f></f>	<g></g>	<h></h>
NORS Reference Number	Outage Start Date	Outage Start Time	Outage End Date	Outage End Time	Number of Customers Affected	Total Number of Customers	911 Facilities Affected (Yes / No)	Service Outage Description (Check all that apply)	Did This Outage Affect Multiple Study Areas (Yes / No)	Service Outage Resolution	Preventative Procedures
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	ce Offerings including Voice Rate Data lection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	423-628-2161
<039>	Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net
<701> <702>	Residential Local Service Charge Effective Date  1/1/2013 Single State-wide Residential Local Service Charge	

> ]	<a1></a1>	<a2> /a2&gt;</a2>	<83>	 501>		<b>₹</b> b3>	<bd><bd><bd><bd><bd><bd><bd><bd><bd><bd></bd></bd></bd></bd></bd></bd></bd></bd></bd></bd>	<bs><bs>       <br <="" th=""/><th><b>6</b></th></bs></bs>	<b>6</b>
- 1	Charta	Euchamas (U.SC)	CAC (CETC)	Bata Tuma	Residential Local	Chana Cubandhan tina Chana	State Universal Company For	Mandatory Extended Area	Takal and the Bakes and St
H	State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	State Subscriber Line Charge	State Universal Service Fee	Service Charge	Total per line Rates and Fe
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402 B U	adband Price Offerings ection Form	FCC Form 481 OM8 Control No. 3060-9985/OM8 Control No. 3060-9819 July 2013
<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data line <	030> 423-628-2161
<039>	Contact Email Address - Email Address of person identified in data line <	030> dave@highlandtel.net

<711>	<al></al>	ka25	 kb15	<625	ics of	## * <b>Z</b> d15**	<d2></d2>	<d3> ;</d3>	≺dA> Ti
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached ( <i>select</i> )
		·					·		
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			work	sheet					
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	erating Companies ection Form	FCC Form 481  OMB Control No. 3060-0986/GMB Centrol No. 3060-0819  July 2013
<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data line <0	030> 423-628-2161
<039>	Contact Email Address - Email Address of person identified in data line <	030> dave@highlandtel.net
<810>	Reporting Carrier Highland Telephone Cooperative	
<811>	Holding Company	
<812>	Operating Company	

<813>	CONTRACTOR OF THE STATE OF THE	<a2></a2>	483× 483× 483× 483× 483× 483× 483× 483×
	Affiliates	SAC	Doing Business As Company or Brand Designation
•		See attached works	sheet
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	pal Lands Reporting	FEC Form 481
Data Col	ection Form	OMB Control No. 3060-0986/OMB Control No. 3060-08 July 2013
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<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data lin	
<039>	Contact Email Address - Email Address of person identified in data lin	line <030> dave@highlandtel.net
<910>	Tribal Land(s) on which ETC Serves	
<b>/310</b> >	Tibal Land(s) on which ETC Serves	
		· <u> </u>
<920>	Tribal Government Engagement Obligation	
\3207	Thibai dovernment Engagement Obligation	Name of Attached Document (.pdf)
		Turne or reasoned booking (ipar)
	If your company serves Tribal lands, please select (Yes,No, NA) for	
	each these boxes to confirm the status described on the attached	
	PDF, on line 920, demonstrates coordination with the Tribal	
	government pursuant to \$ E4.213/a\(0) includes:	
	government pursuant to § 54.313(a)(9) includes:	· .
	government pursuant to § 54.313(a)(9) includes:	Select
	government pursuant to § 54.313(a)(9) includes:	(Yes,No,
		(Yes,No, NA)
<921>	Needs assessment and deployment planning with a focus on Tribal	(Yes,No, NA)
	Needs assessment and deployment planning with a focus on Tribal community anchor institutions;	(Yes,No, NA)
<922>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions; Feasibility and sustainability planning;	(Yes,No, NA)
<922> <923>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions; Feasibility and sustainability planning; Marketing services in a culturally sensitive manner;	(Yes,No, NA)
<922>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions; Feasibility and sustainability planning; Marketing services in a culturally sensitive manner; Compliance with Rights of way processes	(Yes,No, NA)
<922> <923>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions; Feasibility and sustainability planning; Marketing services in a culturally sensitive manner; Compliance with Rights of way processes Compliance with Land Use permitting requirements	(Yes,No, NA)
<922> <923> <924>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions; Feasibility and sustainability planning; Marketing services in a culturally sensitive manner; Compliance with Rights of way processes	(Yes,No, NA)
<922> <923> <924> <925>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions; Feasibility and sustainability planning; Marketing services in a culturally sensitive manner; Compliance with Rights of way processes Compliance with Land Use permitting requirements	(Yes,No, NA)
<922> <923> <924> <925> <926>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions; Feasibility and sustainability planning; Marketing services in a culturally sensitive manner; Compliance with Rights of way processes Compliance with Land Use permitting requirements Compliance with Facilities Siting rules	(Yes,No, NA)

	Terrestrial Backhaul Reporting ection Form	FEC Form 481  OMB Control No. 3060-0986/OMB Control No. 3060-0819  July 2013
<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	423-628-2161
<039>	Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net
<1120>	Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)	
<1130>	Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)	

Lifeline	ection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Dave Crawford
<035>	Contact Telephone Number - Number of person identified in data I	line <030> 423-628-2161
<039>	Contact Email Address - Email Address of person identified in data	line <030> dave@highlandtel.net
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	290565tn1210
		Name of attached document (.pdf)
<1220>	Link to Public Website	HTTP
	"Please check these boxes below to confirm that the attached PDF, on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:	
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	
<1222>	Details on the number of minutes provided as part of the plan,	
<1223>	Additional charges for toll calls, and rates for each such plan.	

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2.2	rice Cap Carrier Additional Documentation		FCC Form 481	
	lection Form		July 2013	3060-0986/OMB Control No. 3060-0819
Including	Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carrie		7 2 2 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
		200555		
<010>	Study Area Code	290565		
<015>	Study Area Name	HIGHLAND TEL COOP-TN		
<020>	Program Year	2014	<del></del>	A
<030>	Contact Name - Person USAC should contact regarding this data  Contact Telephone Number - Number of person identified in data line <03	Dave Crawford )> 423-628-2161		
<035> <039>	Contact Telephone Number - Number of person identified in data line <03  Contact Email Address - Email Address of person identified in data line <03			
<0332	Contact Email Address - Email Address of person identified in data life Cos	05 daveanightandesi.net		
			CONTRACTOR SOURCE	en e
CHECK t	· · · · · · · · · · · · · · · · · · ·	merica Phase I support, frozen High Cost support, High Cost support to offs	•	ns, and Connect America Phase II
	support as set forth in 47 CFR § 54.313(b),(c),	d),(e) the information reported on this form and in the documents attache	d below is accurate.	
	Incremental Connect America Phase I reporting			
<2010>	2nd Year Certification (47 CFR § 54.313(b)(1))			
<2011>	3rd Year Certification {47 CFR § 54.313(b)(2)}			
	Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312)	a)}		
<2012>	2013 Frozen Support Certification	<b>-</b> //		
<2013>	2014 Frozen Support Certification			
<2014>	2015 Frozen Support Certification		·	
<2015>	2016 and future Frozen Support Certification			
	Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))			
<2016>	Certification Support Used to Build Broadband			
			<del></del>	
	Connect America Phase II Reporting (47 CFR § 54.313(e))			
<2017>	3rd year Broadband Service Certification			
<2018>	5th year Broadband Service Certification			
<2019>	Interim Progress Certification			
<2020>	Please check the box to confirm that the attached PDF, on line 202			
	contains the required information pursuant to § 54.313 (e)(3)(ii), a	a recipient		
	of CAF Phase II support shall provide the number, names, and add	· · · · · · · · · · · · · · · · · · ·		
	community anchor institutions to which began providing access to	broadband		
	service in the preceding calendar year.			
<2021>	Interim Progress Community Anchor Institutions	Name of Attached Document Listing Required Information		

	tte Of Return Carrier Additional Documentation		PCC Form 481 OMB Control No. 30 July 2013	350-0986/CIMB Control No. 3060-0819
- <010>	Study Area Code 290565			
<015>		TEL COOP-TN		<u> </u>
<020>	Program Year 2014		. , , , , , , , , , , , , , , , , , , ,	
<030>		e Crawford	-	
<035>	Contact Telephone Number - Number of person identified in data line <030>	423-628-2161		
<039>	Contact Email Address - Email Address of person identified in data line <030>	dave@highlandtel.net		
CHECK to	he boxes below to note compliance on its five year service quality plan (pursua CFR § 54.313(f)(2). I further certify that t Progress Report on S Year Plan	ont to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring the information reported on this form and in the documents attack.		ncial reporting requirements set forth in 4
	•			
(3010)	Milestone Certification (47 CFR § 54.313(f)(1)(i))  Please check this box to confirm that the attached PDF, on line 3012,	Name of Attached Document Listing Required Information		
(3011)	contains the required information pursuant to § 54.313 (f)(1)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.			
(3012) (3013) (3014)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii)) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) If yes, does your company file the RUS annual report Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:  Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	Name of Attached Document Listing Required Information	(Yes/No) (Yes/No)	· · · · · · · · · · · · · · · · · ·
(3016)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows			
	·			
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	290565tn3017	
(3018)	If the response is no on line 3014, Is your company audited?		(Yes/No)	
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:  Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications PDF of Balance Sheet, income Statement and Statement of Cash Flows			
(3020)			<b>=</b>	
(3021)	Management letter issued by the independent certified public accountant that performed the company's financial audit.			
(3022) (3023)	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:  Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,  Underlying information subjected to a review by an independent certified public accountant			
(3024)	Underlying information subjected to an officer certification.		·	
(3025)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows			
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information		<u>.                                    </u>

Christian County - Section 5	lion - Reporting Carrie lection Form				FCC Form 481 OMB Control No. 3 July 2013	060-0986/OMB Control No. 3060-0819
<010>	Study Area Code	290565	_			
<015>	Study Area Name	HIGHLAND TEL COOP-TN				
<020>	Program Year	2014	_			
<030>	Contact Name - Perso	n USAC should contact regardin	g this data Dave Cr	rawford		
<035>	Contact Telephone Nu	umber - Number of person ident	ified in data line <030>	423-628-2161		
<039>	Contact Email Address	s - Email Address of person iden	tified in data line <030	dave@highlandtel	.net	

#### TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

	onsibilities include ensuring the accuracy of the annual reporting ron reported on this form and in any attachments is accurate.	equirements for universal service support
Name of Reporting Carrier:		
Signature of Authorized Officer:		Date
Printed name of Authorized Officer:		
Title or position of Authorized Officer:		
Telephone number of Authorized Officer:		
Study Area Code of Reporting Carrier:	Filing Due Date for this form:	

March 1997 Company of the Company of	tion - Agent / Carrier lection Form	FCC Form 481 W OMB Control No. 3050-0985/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	290565
<015>	Study Area Name	HIGHLAND TEL COOP-TN
<020>	Program Year	2014
<030>	Contact Name - Person USAC	should contact regarding this data Dave Crawford
<035>	Contact Telephone Number -	Number of person identified in data line <030> 423-628-2161
<039>	Contact Email Address - Email	Address of person identified in data line <030> dave@highlandtel.net

#### TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

I certify that (Name of Agent <u>)John Staurulakis. Inc</u> also certify that I am an officer of the reporting carrier; my responsib agent; and, to the best of my knowledge, the reports and data provide	is authorized to submit the information reported on behalf of the reporting carrier.  Illities include ensuring the accuracy of the annual data reporting requirements provided to the authorized ed to the authorized agent is accurate.
Name of Authorized Agent: John Staurulakis, Inc	
Name of Reporting Carrier: HIGHLAND TEL COOP-TN	<u>.</u>
Signature of Authorized Officer: CERTIFIED ONLINE	Date: 10/11/2013
Printed name of Authorized Officer: Greg Patterson	
Title or position of Authorized Officer: COO	
Telephone number of Authorized Officer: 426 628-2121	
Study Area Code of Reporting Carrier: 290565	Filing Due Date for this form: 10/15/2013

#### TO BE COMPLETED BY THE AUTHORIZED AGENT:

as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal	service support recipients on behal	f of the reporting carrier: I have provi
he data reported herein based on data provided by the reporting carrier; and, to the best of my knowledg		
lame of Reporting Carrier: HIGHLAND TEL COOP-TN		•
Name of Authorized Agent or Employee of Agent: John Staurulakis, Inc.		
ignature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE		Date: 10/11/2013
rinted name of Authorized Agent or Employee of Agent: Alice Lewis		
itle or position of Authorized Agent or Employee of Agent Manager		
elephone number of Authorized Agent or Employee of Agent: 217-498-6863		
itudy Area Code of Reporting Carrier: 290565 Filing Due Date for this form	m: 10/15/2013	

Attachments

Highland Telephone Cooperative's demonstration of complying with applicable service quality standards and consumer protection rules:

In establishing this certification in its 2005 ETC Order,<sup>1</sup> the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers." <sup>2</sup> The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement" and that the sufficiency of other commitments would be considered on a case-by-case basis. <sup>3</sup> In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."

As a Cooperative, and in accordance with Tennessee Code Annotated, Title 65 Public Utilities and Carriers, Chapter 29 Telephone Cooperatives, Highland Telephone Cooperative ("Company") is not governed by the Rules of the Tennessee Regulatory Authority for service quality standards and consumer protection rules. However, the Company in the interest of protecting its own customers has incorporated consumer protection procedures comparable to those required of ILEC's in the State of Tennessee, allowing the Company to meet or exceed existing TRA rules. These procedures include, but are not limited to, the following: (1) publishing the rates, terms.

<sup>&</sup>lt;sup>1</sup> Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("2005 ETC Order").

<sup>&</sup>lt;sup>2</sup> Id. at para. 28.

<sup>&</sup>lt;sup>3</sup> Id. The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." Id. at n. 71.

and conditions of service; (2) implementation of anti-slamming and consumer protection procedures; (3) modeling bill presentation to reflect the truth-in-billing requirements; and (4) CPNI, Red Flag Rules, and other applicable federal requirements governing the protection of customers' privacy.

### Highland Telephone Cooperative's Ability to Function in Emergency Situations

Highland Telephone Cooperative ("Company") hereby certifies that it is able to function in emergency situations as set forth in Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2).¹ The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

As a Cooperative, and in accordance with Tennessee Code Annotated, Title 65

Public Utilities and Carriers, Chapter 29 Telephone Cooperatives, Highland Telephone

Cooperative is not governed by the Rules of Tennessee Regulatory Authority, Chapter

1220-4-2, 1220-4-2-.23 Emergency Operation. However, in compliance with Federal

emergency situations rules the Company's central offices have adequate provision for

emergency power a condition allowing them to meet or exceed existing TRA rules for

emergency operations. Specifically, each central office building is supplied with

standby generators and battery back-up that enable the central office to keep running until

power is restored so long as fuel is available, or until system changes are made to reroute

traffic. Company has battery backup at all office locations and in its electronic

Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

#### **REDACTED - FOR PUBLIC INSPECTION**

equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment.

# **Highland Telephone Cooperative**

# Rates, Terms and Conditions for Lifeline Service

(Response to Form 481, Line 1210)

Local exchange service rates and charges as specified below are for basic local exchange service, including Tone Dialing Service, and facilities only. Unless otherwise specified, the rates and charges quoted below are for a period of one month, payable in advance and provide unlimited flat rate calling within the local exchange calling scope.

Residential Local Exchange Access Line Rates<sup>(1)(2)</sup>:

Exchange Name	R-1 Rate
Deer Lodge	\$ 15.43
Huntsville	\$ 15.43
Petros	\$ 15.43
Pine Knot	\$ 15.68
Oakdale	\$ 15.68
Oneida	\$ 15.43
Robbins	\$ 15.43
Stearns Whitley City	\$ 15.68
Sunbright	\$ 15.43
Wartburg	\$ 15.43

<sup>&</sup>lt;sup>(1)</sup> Above listed fees do not include mandatory taxes, fees and surcharges, including, but not limited to 9-1-1 fees, and municipal franchise fees.

<sup>&</sup>lt;sup>(2)</sup> Qualified Lifeline customers are eligible for Lifeline credits or discounts as outlined in the attached Lifeline tariff.

#### **REDACTED - FOR PUBLIC INSPECTION**

# GENERAL SUBSCRIBER SERVICES TARIFF LIFELINE

Highland T Incorporate	Celephone Cooperative	PSC 2 Part II 2 <sup>nd</sup> Revised Sheet 16
D.8.1	Description of Service	
D.8.1.1	The Lifeline program is designed to increase the avaservices to low income subscribers by providing a creservice for qualifying residential subscribers. Basic compliance with the FCC's Order on Universal Service adopts the Feder-State Joint Board recommendation in C with the Telecommunications Act of 1996. Specific prescribed by the Kentucky Public Service Commission and the service Commission an	edit to monthly recurring local terms and conditions are in e in CC Docket 97-157, which C Docket 96-45, which complies terms and conditions are as
D.8.1.2	Lifeline is supported by the federal universal service supp	oort mechanism.
D.8.1.3	Federal baseline support is available for each Lifeline ser subscriber. The amount of credit will not exceed the includes the access line, the Subscriber Line Charge and	charge for local service, which
D.8.1.4	The State Universal Service fund will be funded by Commission. Highland Telephone Cooperative, Inc., wil the KY PSC. The monthly Kentucky Lifeline charge wil line.	l bill the charge as prescribed by
D.8.2	Regulations	
D.8.2.1	General a.	<b>(D)</b>
	b. One low income credit is available per household and residential connection only.	is applicable to the primary
	c. A Lifeline customer may subscribe to any local service residence customers.	offering available to other
	d. Toll blocking, if elected, will be provided at no charge	to the Lifeline subscriber.
	e. The deposit requirement is not applicable to a lifeline blocking. If a Lifeline customer removes toll blocking acceptable credit history, a deposit may be required. Very payments will not exceed the connection and local services.	prior to establishing an When applicable, advance
Issued:	April 2, 201/2	Effective: April 2,2012012
Ву:	General Manager G. Mark Patterson	Dated: 5-17-12-16 SERVICE COMMISSION OF KENTUCKY

### GENERAL SUBSCRIBER SERVICES TARIFF LIFELINE

Highland Telephone Cooperative Incorporated

PSC<sub>2</sub> Part II

1<sup>st</sup> Revised Sheet 17

- The Federal primary interexchange carrier charge (PICC) will not be billed to Lifeline customers who subscribe to toll blocking and do not presubscribe to a long distance carrier.
- A Lifeline subscriber's local service will not be disconnect for non-payment of regulated toll charges. Local service may be denied for non-payment of local and miscellaneous service in accordance with Part I of this Tariff. Access to toll service may be denied for non-payment of regulated tolls. A Lifeline subscriber's request for reconnection of local service will not be denied if the service was previously denied for non-payment of toll charges.
- h. Lifeline is not available for resale.

#### D.8.2.2Eligibility

- a. To be eligible for a Lifeline credit, a customer must be a current recipient of any one of the following low income assistance programs, or have income at or below 135 percent of the Federal Poverty Guideline [Note 1].
  - 1. Supplemental Security Income (SSI)
  - 2. Food Stamps
  - 3. Medicaid
  - 4. Federal Public housing/Section 8
  - 5. Low Income Home Energy Assistance Program (LIHEAP)
  - 6. Temporary Assistance to Needy Families (TANF)
  - 7. The National School Lunch Program's Free Lunch Program (NSL)
- b. All applications for service are subject to verification with the state agency responsible for administration of the qualifying program.

#### Certification D.8.2.3

a. Proof of eligibility in any of the qualifying low income programs should be provided to the Company at the time application for service. The Lifeline credit will not be established until proof of eligibility has been received by the Company. If the customer requests installation prior to the Company's receipt of proof of eligibility, the requested service will be provided without the Lifeline credit. When eligibility documentation is provided subsequent to installation, the Lifeline crdit will be provided on a going forward basis.

[Note 1] This provision is effective June 1, 2012.

**FARIFF BRANCH** 

(N)

April 2, 2012

G. Mark Patterson

General Manager

Effective:

April 25/201/2012

Dated: 5-17-2018-IC SERVICE COMMISSION OF KENTUCKY

#### **REDACTED - FOR PUBLIC INSPECTION**

## GENERAL SUBSCRIBER SERVICES TARIFF LIFELINE

Highland Telephone Cooperative	е
Incorporated	

PSC 2 Part II

1st Revised Sheet 18

- b. Proof of eligibility shall be in the form of an affidavit, certifying under penalty of perjury, that the subscriber is receiving benefits under one of the qualifying programs. It is the customer's responsibility to notify the Company when the customer is no longer participating in any of the qualifying programs.
- c. The Company reserves the right to periodcally audit its records, working in conjunction with the appropriate state agencies, for the purpose of determining continuing eligibility. Information obtained during such audit will be treated as confidential information to the extent required under State and Federal laws. The use or disclosure of information concerning enrollees will be limited to purposes directly connected with administration of the Lifeline plan.

### D.8.3 Rates and Charges

#### D.8.3.1 General

- a. Lifeline is provided as amonthly credit on the eligible residential subscriber's access line bill for local service.
- b. Service charges in Part II are applicable for installing or changing Lifelien service.
- c.d. Service charges do not apply for converting existing service of Lifeline.

D.8.3.2 The Lifeline credit passed through to the customer consists of one Federal baseline credit and one State Universal Service Fund credit per eligible Lifeline customer.

Monthly Recurring Through 7/31/2012 After 7/31/2012

Federal Baseline Support \$10.00 \$ 9.25
Kentucky Universal Service Fund Support \$3.50 \$ 3.50

Total credit per eligible Lifeline customer \$13.50 \$12.75

Issued: April 2, 2012

By: General Manager Dated: 5-17-PUBLIC SERVICE

COMMISSION
OF KENTUCKY

**(T**)

**(D)** 

# **REDACTED – FOR PUBLIC INSPECTION**

# HIGHLAND TELEPHONE COOPERATIVE (SAC 290565) ATTACHMENT - LINE 3012 ATTACHMENT REDACTED IN ENTIRETY